



Minnesota Pollution Control Agency

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September 2, 2015

Ms. Lynda H. Hall
USEPA Headquarters
William Jefferson Clinton Building
Mail Code: 4503T
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Exemption to the "Nonpoint Source Program and Grants Guidelines for State and Territories

Dear Ms. Hall:

The Minnesota Pollution Control Agency is requesting an exemption to the "Nonpoint Source Program and Grants Guidelines for State and Territories" issued April 12, 2013, as provided by Section G of those guidelines. This exemption request, as submitted to Region 5, will demonstrate a clear benefit to the Minnesota Non-Point Source Management Program Plan (NPSMPP) priorities. This exemption would be in effect for federal fiscal year 2015 award.

We are seeking exemption to fund the following three priority projects. These projects are eligible to fund under Minnesota's approved NPSMPP. The NPSMPP goals, as well as a brief justification of how these goals will be met, are described below:

| Project Name and Sponsor | Grant Request | Primary NPS Reference | Justification |
|---|---------------|--|---|
| Greater Blue Earth River Basin Drainage Partnership Sponsor: Greater Blue Earth River Basin (GBERBA) | \$145,600 | Chapter 4.3; Goal 2, Action Step 4, p 4.3-138 <u>Goal:</u> "Promote healthy sediment regime for MN's Streams and Rivers" | The results of this project will document the willingness of landowners and drainage authorities to adopt a process of repairing ditch structures with more conservation-minded practices. The impact of this project would be statewide since ditch structure repair and maintenance is an issue in the majority of 8 digit HUCs. |
| Quantifying Cropland-Riparian Water Management Sponsor: Regents of the University of Minnesota | \$283,787 | Chapter 9; Goal 2, Action Step 2, p 9-253 <u>Goal:</u> "Continual research, development and refinement of BMPs that minimize nutrient losses from agricultural systems. Continual research of nutrient sources and transport mechanisms in agricultural systems for the development of tools for resource | The results of this project will determine how the presence of subsurface drainage changes the comprehensive water budget of crop production systems and adjacent riparian land. Results will allow SWCD's, private vendors and farmers to design water management infrastructure in a way that is both effective for production and environmentally responsible. |


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| | | planners/managers to prioritize BMP implementation and selection..." | This project will impact about two-thirds of the state because of the prominence of cropland drainage in Minnesota. In addition, this project will provide valuable needed information for the National Ag Drainage Management Task Force. |
| eLINK Database Support <u>Sponsor</u> : Board of Water and Soil Resources | \$60,000 | Chapter 8; Goal 3, Action Step 2, p 8-216 <u>Goal</u> : "Continue to improve the reliability and accuracy of decision-making tools associated with agricultural erosion and sediment control" | The project sponsor will provide technical support for the MPCA staff and local government units. It will also provide load reduction and BMP information for Federal and state agencies to use available resources in an effective manner. In addition, the information generated is utilized to meet the Section 319 pollutant load reduction requirement and the MPCA's Annual Watershed Achievements Report. |
| Total | \$489,387 | | |

To qualify for an exemption, we understand that at least twice the amount of the full grant must be leveraged with state funds. Lists of eight projects (referred hereinafter to as exemption projects) that total \$5,325,367 have been submitted to Region 5. Each of these projects meet the Region's expectations for an approved watershed-based plan or approved alternative. As you are aware, pp. 40 and 41, paragraph 2, sentence 3 reads: "If a state qualifies for this exemption, federal watershed *project funds* allocated to the state may be used for the full range to *implement approved NPS management programs*" [emphasis added]. The work plans are to be included as an amendment to our previously submitted FFY2016 work plan and will be managed in accordance with Section 319 requirements.

If you have any questions please don't hesitate to contact me so we can set up conference call with all parties.

Thank you for your consideration.

Sincerely,


Gaylen F. Reetz
Director
Watershed Division

GR:cp